Taiwan Trading Company Limited PMB 3581 Box 10002 Saipan, MP 96950

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Clerk
District Court

JUL - 1 2008

For The Northern Mariana Islands
By\_\_\_\_\_\_(Deputy Clerk)

## IN THE UNITED STATES DISTRIC COURT FOR THE COMMONWEALTH OF THE NORTHERN MARIANA ISLAND

HOU YAN JUN,	)	CIVILACTION NO. 08-0025
	)	
Plaintiff,	)	
	)	
vs.	)	ANSWER TO COMPLAINT
	)	
TAIWAN TRADING CO., LTD.	)	
	)	
Defendant.	)	

**COME NOW,** Taiwan Trading Co., Ltd., (hereafter the "Defendant"), and file this answer in response to the Complaint of Plaintiff, Hou Yan Jun, (hereafter the "Plaintiff").

- 1. With respect to paragraphs 1, 2, 3, 4, 5 and 6 of the Complaint, Defendant admits that this court has jurisdiction of the claim and that Plaintiff alleges certain statutes that provide the Court with jurisdiction. Otherwise, the allegations in the paragraph are denied.
- 2. With respect to paragraph 7 of the Complaint, Defendant admits that Plaintiff named in said paragraph, is Chinese residing in the CNMI, but denies writing contract for one (1) year each as duly approved by CNMI Department of Labor pursuant to Non-resident Workers Act.
- 3. With respect to paragraph 8 and 9 of the Complaint, Defendant admits that business in Saipan has continuously been running.
- 4. With respect to paragraph 10 of the Complaint, Defendant admits Plaintiff to amend this complaint.
- 5. With respect to paragraph 11 of the Complaint, Defendant denies any unlawful acts and omissions.
- 6. With respect to paragraph 12 of the Complaint, Defendant admit name of the company is correct.

- 7. With respect to paragraph 13 of the Complaint, Defendant denies signed an employment contract with Plaintiff.
- 8. With respect to paragraph 14, 15, 16, 17 and 18 of the Complaint, Defendant denies the same.
- 9. With respect to paragraph 19, 20 and 21 of the Complaint, Defendant denies violation.
- 10. With respect to paragraph 22, 23, 24 and 25 of the Complaint, Defendant denies existence of the contract.
- 11. With respect to paragraph 26, 27, 28 and 29 of the Complaint, Defendant denies the same.
- 12. All paragraphs or portions of the Complaint, not specifically admitted or denied previously, are hereby denied.

## **AFFIRMATIVE DEFENSES**

As a separate and further answer to Plaintiff's Complaint and by way of affirmative defense, Defendant allege as follows:

- 1. Plaintiff's claim of written contract is false and untrue.
- 2. Plaintiff doesn't meet the Non-resident Workers Act.
- 3. Defendant is a Corporation incorporated following the law and paying the wage as requirement.

## PRAYER FOR RELIEF

WHEREFORE, Defendant prays that the Court grant the following relief:

- 1. That Plaintiff take nothing from the Complaint; and
- 2. That Defendant is awarded costs, fees and such other relief as appropriate under law and equity.

Respectfully submitted this 1<sup>st</sup> day of July, 2008

TAIWAN TRADING CO., LTD LIU, CHI-KWANG

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